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**PACIFIC**  **TELESIS**  
Group - Washington

EX PARTE OR LATE FILED

August 5, 1993

AUG - 5 1993

EX PARTE

Mr. William Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

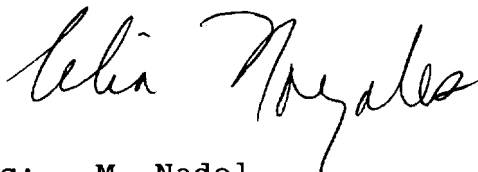
RE: CC 92-77

Dear Mr. Caton:

Today, Ray Ruiz and Derek Hibbard, both with Pacific Bell, and I met with Mark Nadel of the Common Carrier Bureau's Policy and Program Planning Division to discuss Pacific Bell's position in the proceeding indicated above. The attached document was used during the course of that discussion.

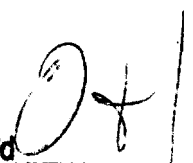
Pursuant to Section 1.1206(a)(1) of the Commission's Rules, an original and two copies of this notification are attached. Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



cc: M. Nadel  
G. Phillips

No. of Copies rec'd  
List A B C D E



## Prisons Must Be Included In The BPP Design

- Those paying for prison originating calls deserve the BPP benefits of end user targeted competition, including market based pricing.

- Families of prisoners
- Public defenders
- Support groups
- Others

- The unit BPP cost depends on the inclusion of prisons.

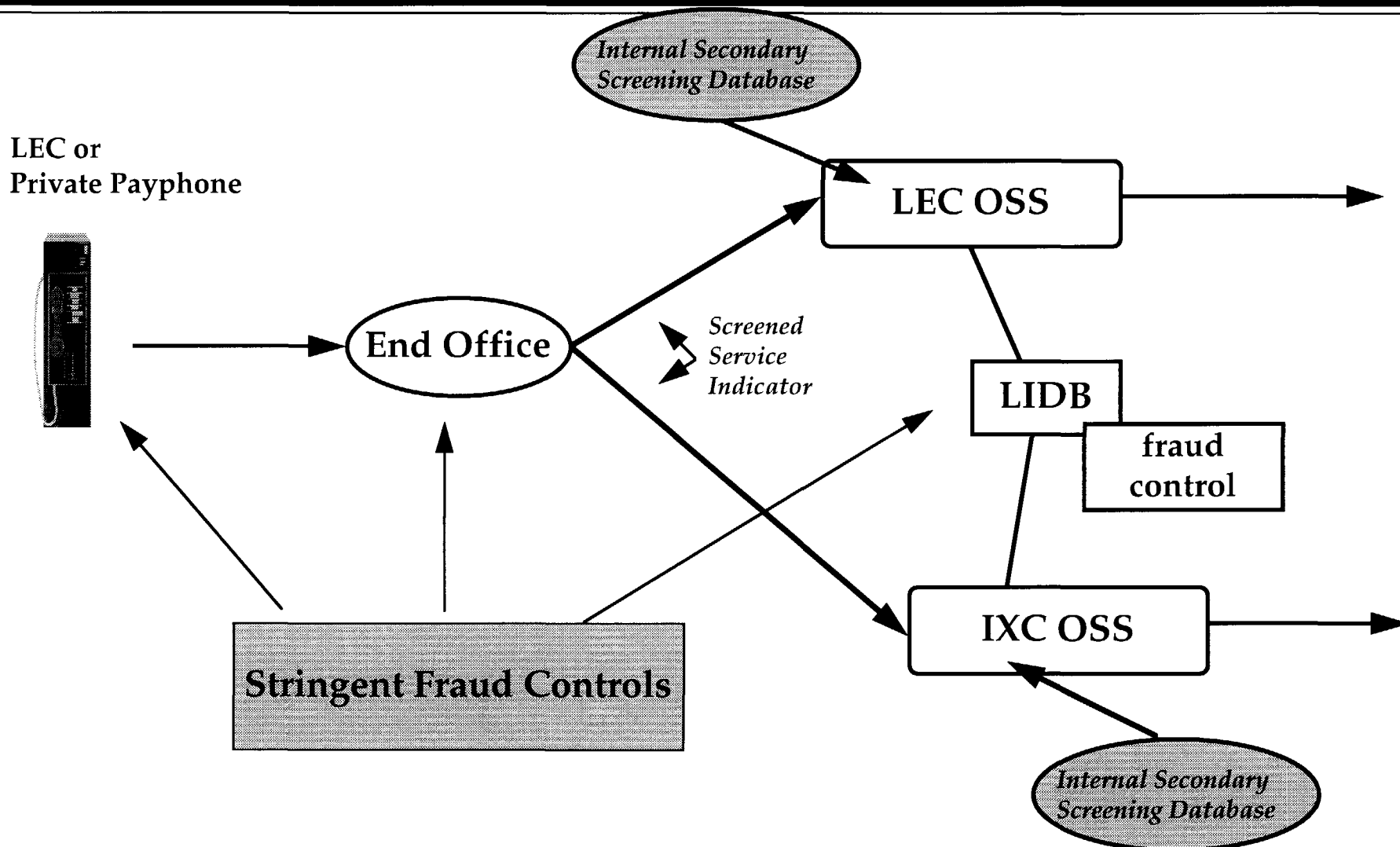
- Excluding calls originating from prisons could set an unfair precedent, by beginning to deny certain consumers choice of carrier.

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

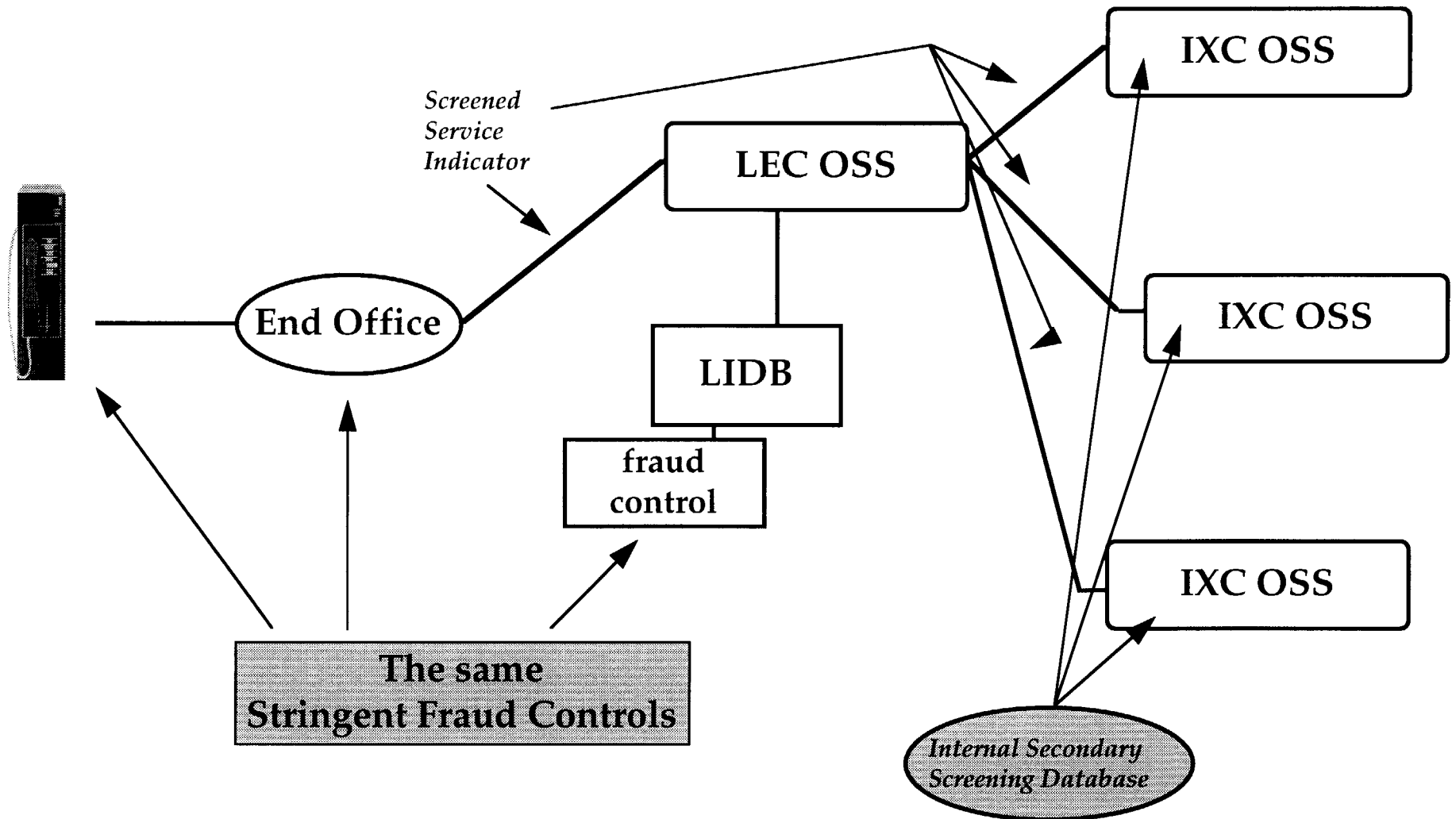
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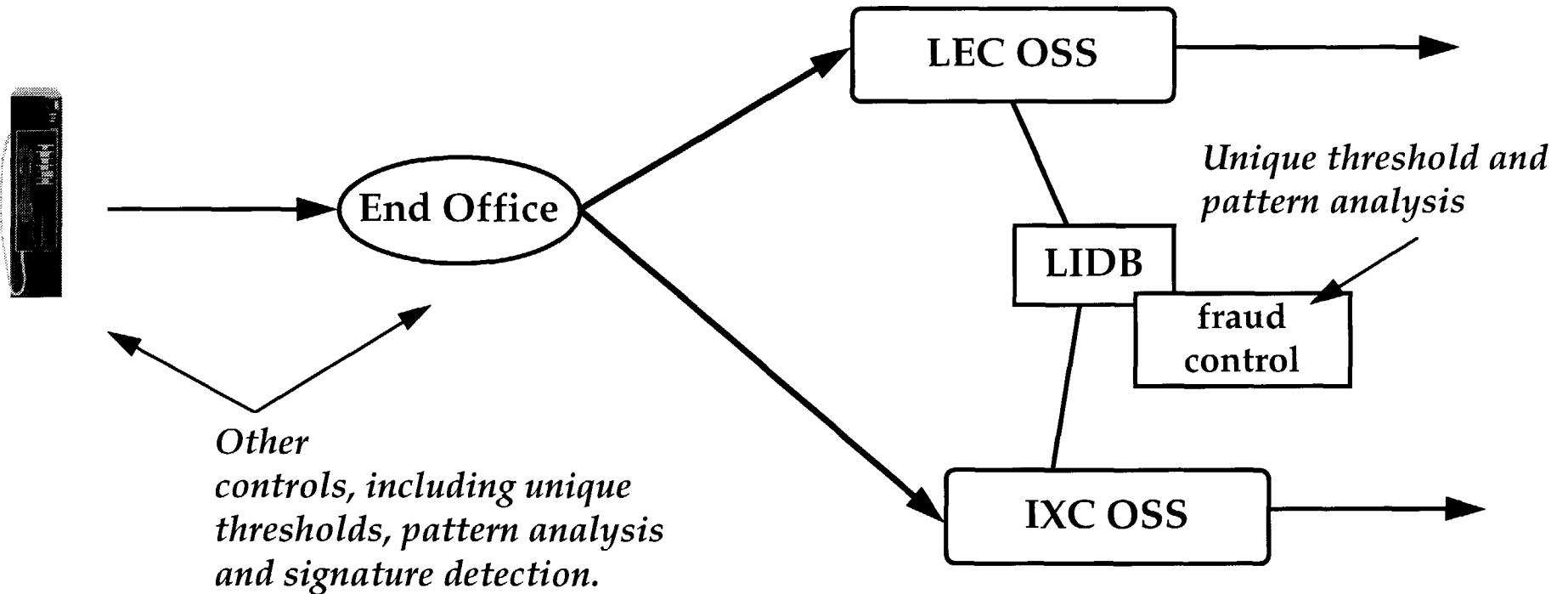
## Fraud Control/ Security - Today



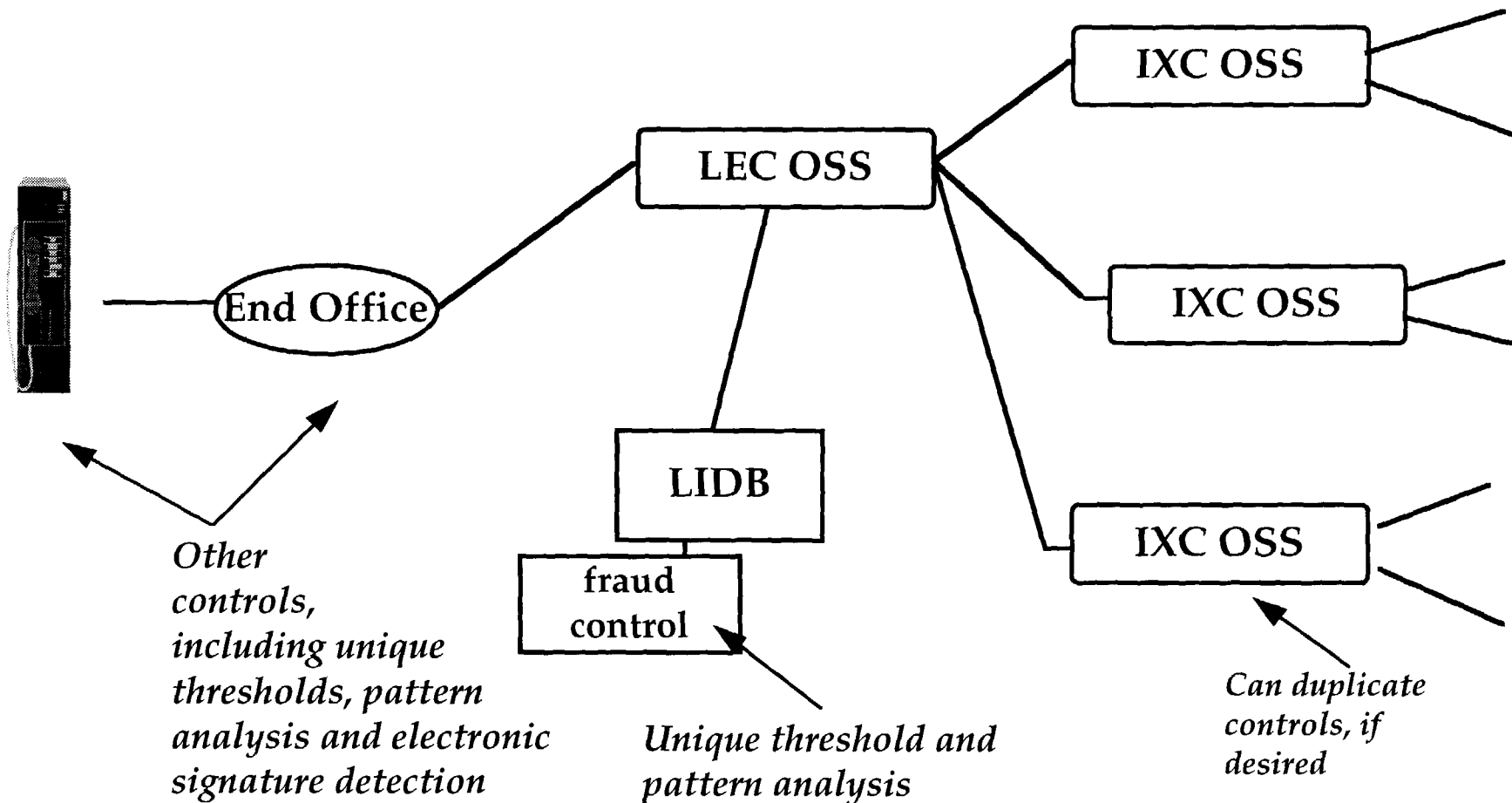
With BPP - The same controls will be in place



## Subscription Fraud - Today



## Subscription Fraud - With BPP the same controls can be in place



## Other Pacific Bell BPP Points

- The issue is more than carrier selection - it is also ubiquity and convenience.
- The proliferation of proprietary cards does not solve these problems.
- Having the LEC provide BPP does not stifle innovation. In fact, it is the only means to provide seamless 0+ card features.
- Conformance to standards will not stifle innovation. The same IXC's today have to conform to very similar standards.
- Signage is not the panacea.